

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

KELLY BLAND, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

OUR WORLD ENERGY LLC  
AND  
EDJ ENTERPRISES INC.

Defendants.

Case No. 4:24-cv-00994-P

**JURY TRIAL DEMANDED**

**DECLARATION OF KELLY BLAND**

1. I, Kelly Bland, am over the age of eighteen and, if called to testify in this action, could state the following.
2. This Declaration is being made under the penalty of perjury pursuant to 28 U.S.C. § 1746.
3. I make this Declaration in opposition to the Defendant Our World Energy's motion to dismiss for lack of personal jurisdiction.
4. I am the plaintiff in this lawsuit.
5. I have the user of the residential telephone number 817-XXX-XXXX.
6. This telephone number is registered to my residential address in Texas.
7. I am a resident of the State of Texas.
8. The 817- area code is associated with the State of Texas.
9. The telephone number has been on the National Do Not Call Registry since I registered it there years prior to the calls at issue.
10. I did not ask for or request calls from Our World Energy LLC, or for that matter SunSCI or EDJ Enterprises.

11. Defendant Our World Energy directed its conduct into Texas by, among other things, directing its sales agents to ring my doorbell in Texas while I was out shopping in Texas for the purpose of selling me Our World Energy's solar panels.

12. It is also my understanding that Our World Energy sells solar panels to be sold by and installed by a branch office in Grand Prairie, Texas.

13. Some of the calls I received had Texas area codes, including 817- area codes, as well, further demonstrating that the caller directed its conduct at Texas, including to sell the Defendant's solar panels.

14. The calls I received all promoted Defendant Our World Energy and were made for the purpose of attempting to sell its solar panels. No other company's products, other than Our World Energy's, were listed or stated on the call.

15. Based on the Defendant's agent visiting my house in Texas prior to any of the calls to market me for solar panels, Our World was well aware that I was located in Texas, but continued to allow itself and its agents, including SunSCI and EDJ, to market to me.

**I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.**

**Executed this 4th day of March 2025, in the United States of America,**



Kelly Bland (Mar 4, 2025 18:17 CST)

Kelly Bland